

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

UNITED STATES OF AMERICA)
)
 v.) CRIMINAL NO. 05-10199-RWZ
)
 PASCUAL JOSEPH GUERRIER)

MOTION FOR EXTENSION OF TIME
WITHIN WHICH TO FILE MOTIONS

Counsel for the defendant Pascual Joseph Guerrier respectfully moves this Court for an extension of time within which to file pretrial motions in the above-captioned case. Pretrial motions were due to be filed on October 24, 2005. Counsel requests an extension of time up to November 18, 2005 for the filing of motions. As grounds for this extension of time, undersigned counsel states that she has been finishing a brief to the Court of Appeals for the First Circuit in the case of United States v. Andre Ellis, no. 04-1498, and is preparing for trial in the case of United States v. Girard Lafortune, no. 03-10366-PBS. The Lafortune trial is scheduled to begin on October 31, 2005. Counsel expects to finish the Ellis brief in the next day or two. For these reasons, counsel has not been able to complete her research and draft substantive motions in the above-captioned case. Counsel is asking the court to grant her until November 18, 2005. Counsel expects the Lafortune trial to end the week of November 7. This should give counsel time to research and write

motions after the trial ends.

Counsel would agree to extending the government's response to any such motions for a period of 14 days after the filing date, and that the delay is excluded for purposes of the Speedy Trial Act.

WHEREFORE, for the above-stated reasons, undersigned counsel respectfully requests that this motion for an extension of time to file pretrial motions be granted.

PASCUAL JOSEPH GUERRIER
By his attorney,

/S/ Syrie D. Fried
Syrie D. Fried
B.B.O. # 555815
Federal Defender Office
408 Atlantic Avenue, 3rd Floor
Boston, MA 02110
Tel: 617-223-8061